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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ANDREI RAILEANU,)

Defendant.)

Case No. 2:15-cr-0250-APG-GWF

STIPULATION TO CONTINUE SENTENCING

(First Request)

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rules 45-1, the parties respectfully request that the Court approve this stipulation to extend the current date for sentencing in this matter. In support of this stipulation, the parties represent the following:

1. On August 3, 2017 the Court permitted Defendant to enter a *nolo contendere* plea in this case. Accordingly, trial was vacated in this matter.

2. By Notice issued on September 26, 2017 the Court set the date for Defendant's sentencing to occur on November 7, 2017 at 2 p.m.

1 3. Counsel for Defendant represents that he communicated with his client last week
2 and that his client has instructed him to seek a continuance of the current sentencing date.
3 Defendant has indicated he has additional questions regarding his pre-sentence report which are
4 best discussed in person. However, because Defendant is detained in Pahrump, Nevada, his
5 counsel will have to dedicate at least half a day traveling to the Southern Nevada Detention
6 Center while balancing several other competing case commitments including out of travel for
7 depositions in a civil case. The additional time requested herein will permit counsel for
8 Defendant sufficient time to meet with Defendant while communicating any additional
9 information, if any, to the United States Probation Officer assigned to Defendant's case and the
10 Court that may be appropriate based upon the meeting with Defendant. Depending upon what is
11 communicated to the probation officer, an amendment to the pre-sentence report may be
12 required.

13 4. Counsel for Defendant represents that he is authorized based upon instructions
14 received from his client to request this continuance of the current sentencing date. This
15 stipulation is being sought by Defendant based upon his need to confer with his attorney and not
16 for the purpose of any delay.

17 5. In light of the foregoing, the parties respectfully request that the Court schedule
18 sentencing in this case to occur no earlier than December 11, 2017.

21 */s/ Brandon Jaroch*

22 _____
Brandon Jaroch, Esq.

23 Attorney for the United States

24 Dated: November 1, 2017

Respectfully submitted,

21 */s/ Paul S. Padda*

22 _____
Paul S. Padda, Esq.

Attorney for the Defendant

Dated: November 1, 2017

1 **IT IS SO ORDERED:**

2 **The Court having reviewed the**
3 **stipulation submitted by the parties to**
4 **continue the current sentencing date, it is**
5 **hereby ordered that the stipulation is**
6 **approved. Sentencing in this matter**
7 **currently scheduled for November 7, 2017**
8 **is hereby continued to and until the**
9 **following date and time:**

10 **Date:** February 1, 2018

11 **Time:** 9:30 a.m., Courtroom 6C.

12 
13 **UNITED STATES DISTRICT JUDGE**

14 **Dated:** November 1, 2017

15 **CERTIFICATE OF SERVICE**

16 In compliance with the Court's Local Rules, the undersigned hereby certifies that on
17 November 1, 2017 a copy of the foregoing document was served (via the Court's CM/ECF
18 system) upon all counsel of record in this matter.

19 */s/ Paul S. Padda*

20 Paul S. Padda, Esq.